



COMMONWEALTH OF PUERTO RICO / OFFICE OF THE GOVERNOR

Environmental
Quality Board

December 30, 1994

Mr. Barry Tornick
Corrective Action Section
Hazardous Waste Facilities Branch
US Environmental Protection Agency
26 Federal Plaza - Region II
New York, New York 10278

RE: CLOSURE/POST-CLOSURE PLAN FOR
THE PROTECCION TECNICA
ECOLOGICA, INC.
CLOSURE OF WASTE UNIT NUMBERS
1, 2, 3, 5, 7, 9, 10, 11, 12,
13, 16 AND 17

Dear Mr. Tornick:

The Permits and Engineering Section of the Land Pollution Control Area of the EQB has reviewed the Closure/Post Closure Plan for the Protección Técnica Ecológica, Inc.

Enclosed you will find the comments to the Closure/Post Closure Plan.

If you have any questions regarding this issue do not hesitate to contact Mr. Herminio Concepción or Eng. Grisell V. Díaz Cotto, of my staff, at (809) 766-2817 or 767-8181 ext. 2351.

Cordially,


Israel Torres Rivera
Acting Director
Land Pollution Control Area

HCV/eas

Enclosure

→ Given to Clifford

ENVIRONMENTAL PROTECTION
AGENCY
1995 JAN 18 PM 3:35
AWM-HAZ WASTE FAC. BRANCH

PROTECCION TECNICA ECOLOGICA, INC.

COMMENTS

CLOSURE/POST CLOSURE PLAN

UNIT NUMBERS 1,2,3,5,7,9,10,11,12,13,16 AND 17

The Permits and Engineering Section of the Land Pollution Control Area of the EQB has reviewed the closure documents submitted by OHM Corp. on behalf of Protección Técnica Ecológica, Inc. (PROTECO) for hazardous waste units at PROTECO's Peñuelas facility. In General, the Cap proposed for PROTECO for closure of waste unit numbers 1, 2, 3, 5, 7, 9, 10, 11, 12, 13, 16 and 17 is good defined. The geological conditions at the site are advantageous for the landfill cover that they propose and for the rest of their activities.

Is our concern at this moment the closure of the oil lagoon identified as unit #9. Is our opinion that the facility must be more specific and submit more details for the closure of this unit with the purpose of determine that the mixture in the lagoon will not affect the cover proposed. The facility should bring information concerning:

- An explication about how is possible to find oil saturated clay/silt at 23 feet depth in the soil boring GT5 at about 100 feet from unit #9, if the material in the oil lagoon is not migrating.
- Evidence of an accurate amount of material deposited in the lagoon since the beginning of operation of the unit.
- Demonstrate that the rate of oil versus cement and clay is right according with the accurate volume of the material deposited in the lagoon, and include evidence of

the exact amount of material used to stabilization and solidification.

- Demonstrate that the material in unit #9 is not going to migrate through the drainage proposed by the facility which pass close to the unit, neither migrate to the groundwater.

Is necessary that the facility submits evidence that the material in the oil lagoon is completely homogeneous and is solidified. By other means, if necessary, the facility could make soil borings in that unit with the purpose to prepare one vertical, and one horizontal cross section to demonstrate that the material is homogeneous and stable.

The above-mentioned remarks are made with the purpose of collect complete evidence to be sure that the material is not going to migrate to the groundwater system or to the surface through the proposed drainage.

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